

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

CHINA NORTHEAST PETROLEUM
HOLDINGS LIMITED; WANG HONGJUN
(a/k/a Hongjun Wang); JU GUIZHI (a/k/a
Guizhi Ju); and JIANG CHAO (a/k/a Chao
Jiang),

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and
SUN JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.
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No. 12 CV 8696 (NRB)

ECF Case

ORAL ARGUMENT REQUESTED

**NOTICE OF DEFENDANT JIANG CHAO'S MOTION TO DISMISS PLAINTIFF
UNITED STATES SECURITIES AND EXCHANGE COMMISSION'S COMPLAINT
WITH PREJUDICE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum Of Law Of Defendant Jiang Chao In Support Of His Motion To Dismiss Plaintiff United States Securities And Exchange Commission's Complaint With Prejudice, Defendant Jiang Chao will move this Court, before the Honorable Naomi Reice Buchwald, United States District Judge, at a time and date to be determined by the Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007-1312, Courtroom 21A, for an Order dismissing all claims against Defendant Jiang Chao with prejudice, and granting such other and further relief as the Court deems just and proper.

Dated: San Francisco, CA
April 12, 2013

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Thad A. Davis

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